1	Colin R. Kass (pro hac vice) PROSKAUER ROSE LLP		
2	1001 Pennsylvania Ave., N.W.		
3	Washington, D.C. 20004 (202) 416-6890		
	ckass@proskauer.com		
4	David A. Munkittrick (pro hac vice)		
5	PROSKAUER ROSE LLP		
6	Eleven Times Square New York, New York 10036		
7	(212) 969-3000 dmunkittrick@proskauer.com		
8	was a substitution of the		
9	Attorneys for Defendant Bright Data Ltd.		
10	Additional counsel listed on signature page		
11	ANNAMED OF A TIPO D	ACTION OF COMPA	
12	UNITED STATES DISTRICT COURT  NORTHERN DISTRICT OF CALIFORNIA		
13			
14	V CORD a Navada comparation	Case No. 23-CV-03698-WHA	
15	X CORP., a Nevada corporation, Plaintiff,		
16	v.	BRIGHT DATA'S RULE 79-5(f)(3) STATEMENT IN RESPONSE TO X'S	
17		ADMINISTRATIVE MOTION TO SEA	
18	BRIGHT DATA LTD., an Israeli corporation,	(ECF NO. 296)	
19	Defendant.		
20	Defendant.		
21			
22			
23			
24			
25			
26			
27			
2.8			

1 Pursuant to Civil Local Rule 79-5(f)(3), Defendant and Counterclaim-Plaintiff Bright Data 2 Ltd. submits this statement in response to X Corp.'s Administrative Motion to Consider Whether Another Party's Material Should Be Sealed (ECF No. 296), filed on May 19, 2025. Bright Data 3 4 does not seek to seal any of the information identified in X's Administrative Motion, so the Court 5 may deny X's Administrative Motion. 6 Dated: May 27, 2025 Respectfully submitted, 7 8 /s/ Colin R. Kass Colin R. Kass\* Robert C. Goodman (Bar No. 111554) 9 Erica T. Jones\* Lauren Kramer Sujeeth (Bar No. 259821) 10 ROGERS JOSEPH O'DONNELL, PC PROSKAUER ROSE LLP 311 California Street, 10<sup>th</sup> Floor 1001 Pennsylvania Ave., N.W. 11 San Francisco, CA 94104 Washington, D.C. 20004 (202) 416-6890 (415) 956-2828 12 rgoodman@rjo.com ckass@proskauer.com lsujeeth@rjo.com ejones@proskauer.com 13 14 Sehreen Ladak (Bar No. 307895) David A. Munkittrick\* PROSKAUER ROSE LLP Reut N. Samuels\* 15 2029 Century Park East, Suite 2400 Timothy E. Burroughs\* Los Angeles, CA 90067-3010 Michael R. Clifford Beckwith\* 16 (310) 284-5652 Peter C. Angelica\* 17 sladak@proskauer.com PROSKAUER ROSE LLP Eleven Times Square 18 Genesis Sanchez Tavarez\* New York, New York 10036 (212) 969-3000 PROSKAUER ROSE LLP 19 dmunkittrick@proskauer.com One International Place rsamuels@proskauer.com 20 Boston, MA 02110 (617) 526-9675 tburroughs@proskauer.com 21 mbeckwith@proskauer.com gsancheztavarez@proskauer.com pangelica@proskauer.com 22 Attorneys for Defendant Bright Data, Ltd. 23 \*Admitted pro hac vice 24 25 26 27

28